	United States Environmental Protection Agency Washington, DC 20460				Work Assignment Number						
EPA					1-03						
LFA	Work A	Work Assignment				Other Amendment Number:					
Contract Number Contract Period 04/29/2011 To 03/28/2012					Title of Work Assignment/SF Site Name						
EP-D-11-006 Base X Option Period Number					Region Haze SIP for VI						
Contractor Specify Section and paragraph of Contract SOW EASTERN RESEARCH GROUP, INC. K											
Purpose: X Work Assignment		Period of Performance									
Work Assignment Work Assignment Close-Out Work Assignment Amendment Incremental Funding											
Work Plan Approval					From 07/15/2011 To 03/28/2012						
Comments:	ui .										
This work assignment includes 250 hours for preparation of the work plan and to begin work on the work assignment.											
	A			ac							
Superfund		ounting and Approp	*			Х	Non-Superfund				
Note: To report additional accounting and appropriations date use EPA Form 1900-69A. SFO											
(Max 2)											
	propriation Budget Org/Code de (Max 6) (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Do	ollars) (Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)				
1											
2											
3											
4					<u> </u>						
5		N: 1000 0 0									
0		thorized Work Assig	gnment Ceilin								
Contract Period: 04/29/2011 To 03/28/20	Cost/Fee: 12			LOE:	0						
This Action:					- 250						
							-				
Total: 250											
	50-1407	ork Plan / Cost Esti	mate Approva								
Contractor WP Dated: Cost/Fee:											
Cumulative Approved: Cost/Fee: L											
					Branch/Mail Code:						
					one Number 212-637-3712						
All and all Properties All			FAX	FAX Number:							
Project Officer Name Reconstruct User			Bran	Branch/Mail Code:							
					one Number:						
and the latest and the second					AX Number:						
					Branch/Mail Code:						
					one Number:						
(Signature) (Date) Contracting Official Name Rodney-Daryl Jones					FAX Number: Branch/Mail Code:						
					hone Number: 919-541-3112						
					AV Number:						

I. Title: Support for the Development of the Regional Haze SIP for the Virgin

Islands

Contractor Name: ERG Contract #: EP-D-11-006

WA #: 1-03

II. Work Assignment Manager (WAM):

Carol Bellizzi
United States Environmental Protection Agency, Region 2
Air Programs Branch
25th Floor
290 Broadway
New York, NY 10007-1866

Phone: 212 637 3709

Technical Contact: Robert Kelly E-mail: Kelly.bob@epa.gov

III. BACKGROUND:

Section 169A of the Clean Air Act requires sources affecting areas designated as Class I areas to reduce emissions to eliminate all anthropogenic obscuration of visibility, with the goal of reaching natural background levels of visibility by 2064. EPA requires a State Implementation Plan that describes the level of visibility resulting from natural impairment and how much anthropogenic sources need to be reduced in the first ten years (by 2018) to keep the area on track to obtain the goal of reaching natural background levels by 2064.

The Virgin Islands National Park on St. John in the United States Territory of the Virgin Islands, is a Class I area where visibility is a resource to be protected. Thus, the Virgin Islands need to develop a plan to reduce emissions to improve visibility over the ten year period ending 2018.

The purpose of this work assignment is to use existing templates and information provided by EPA and the VI Department of Planning and Natural Resources (VIDPNR) to prepare a State Implementation Plan for the Virgin Islands to address the need to reduce emissions to provide reasonable progress toward reducing regional haze in the Virgin Islands National Park. This work assignment will also evaluate potential BART sources provided by EPA, using EPA guidelines, including the multi-factor analysis and information provided by EPA and the VIDNPR.

IV. STATEMENT OF WORK (SOW):

The first task will be to develop a work plan to accomplish the goals of this work assignment. No work on subsequent tasks shall begin until the work plan is approved.

The WAM is authorized to provide written technical direction in accordance with the terms of the contract. The contractor shall not duplicate any work previously performed.

The Contractor shall perform the following tasks:

Task 1.

Work plan preparation

Within twenty days of issuance of this work assignment, the Contractor shall submit a cost estimate for accomplishing this work assignment. The estimated cost shall include all categories of direct labor, overhead, special testing, travel, consultants and subcontractors, other direct costs and estimated fee. In additional to the cost estimate, the Contractor shall submit a work plan. The work plan shall include an introduction, project approach, schedule of work and staffing. The Contractor shall be required to notify the EPA WAM prior to any changes of Contractor staff assigned to this project after EPA approves the work plan. The Contractor shall meet with the EPA WAM to discuss the project objectives and scopes and establish coordination procedures. The Contractor shall inform the EPA WAM of when it is ready for this discussion. The WAM will set the time and method of communication. The EPA WAM will act as a point of contact between EPA and the Contactor.

The workplan shall include a listing of the EPA guidance documents on development of Regional Haze plans, including, but not limited to, documents associated with EPA's final preamble and BART guidelines issued on July 5, 2005, when EPA issued final amendments to its July 1999 regional haze rule. These amendments apply to the provisions of the regional haze rule that require emission controls known as Best Available Retrofit Technology, or BART, for industrial facilities emitting air pollutants that reduce visibility. The amendments include final guidelines, known as BART guidelines, for states to use in determining which facilities must install controls and the type of controls the facilities must use.

Guidance includes EPA's <u>Final Preamble and BART Guidelines (PDF)</u> and the original <u>1999 Regional Haze Rule</u>. Since signing the June 15, 2005 final rule and prior to publication, EPA corrected errors as described in the following memorandum. (Corrected files posted on 6/27/2005 <u>Memo dated June 24, 2005 (PDF)</u> (5 pp, 81k).)

The workplan shall include an estimate of the hours needed to produce a state implementation plan for Regional Haze for the Virgin Islands, and an estimate of the hours needed to evaluate the need for BART controls on a typical source., as well as an estimate of the hours and costs to apply an existing set of modeling data and outputs from the CALPUFF model to evaluate the reduction in concentration of visibility-reducing pollutants at the St. John National Park.

Project Management

The work plan shall include project management activities, including conference calls with the WAM every two weeks, preparation of monthly progress reports; tracking of budgets and expenditures; coordination of Contractor staff; communications with EPA; and preparation and submittal of management deliverables and technical reports, as well as a final report.

Task 2: Prepare a State Implementation Plan for Regional Haze for the Virgin Islands

The Contractor shall use EPA guidance and a template prepared by MARAMA/MANE-VU (to be supplied by EPA) to write the Virgin Islands SIP for Regional Haze from existing sections already prepared by EPA Region 2, plus existing data, analyses and modeling results. The contractor shall identify any policy decisions to the EPA WAM and EPA shall provide the policy information to be included in the SIP by the Contractor.

Task 3: Evaluate the Factors for BART Controls on Sources and Identify Potential BART Controls

The WAM will provide to the Contractor a list of sources that may be eligible for Best Available Retrofit Technology (BART) on units at the sources. The Contractor shall use EPA's guidance and evaluate the factors provided in EPA's guidance as they relate to the sources.

The Contractor shall use the information provided by EPA to list emission control technologies that the emission sources potentially subject to BART could apply to reduce their emissions by various amounts up to the greatest amounts possible. The Contractor shall provide information on the cost and reductions in emissions for pollutants that cause regional haze, including and not limited to particulate matter (fine and coarse), sulfates, nitrates and carbon compounds.

Administrative Requirements:

Through Technical Direction (TD) by the WAM, the Contractor shall present an informal briefing and review of all work performed under this work assignment.

Through TD by the WAM, the Contractor shall provide a one-day briefing on the results of the modeling.

The Contractor shall provide:

- an as-complete-as-possible plan for the Virgin Islands to review for possible adaption and adoption as a submittal for Regional Haze
- multi-factor analyses of sources that may be subject to BART
- any facility information in electronic form

V. Deliverables:

Task 1. Work plan to be submitted to the WAM in 20 days after the effective date of this work assignment. .

Task 2. A State Implementation Plan for the Virgin Islands for their review for possible adaption and adoption as a submittal to address Regional Haze

Task 3. BART analyses for sources provided by the WAM

٠

VI. Reporting Requirements:

- 1) The Contractor shall provide reports on progress on this work assignment every two weeks. The progress report shall summarize the overall progress plus a description of each task or logical segment of work on which effort was expended during the past two weeks. Any problems (technical or administrative) that have developed shall be listed and shall continue to be listed until completed or resolved by agreement by the WAM. The report shall include a section showing cost and labor hours expended to date and projected expenditures and labor hours at completion. Each report shall be submitted on or before on the Monday following each two-week period. The two-week periods will be designated by the WAM.
- 2) During the period of performance of this work assignment, the Contractor shall immediately inform the Technical Representative by telephone of any problems that may impede performance along with any corrective actions needed by the Contractor or EPA to solve the problem. The Contractor shall provide to the WAM electronic copies of model results upon request at any time during the work assignment.
- 3) The Contractor shall provide a final report, summarizing how the products were prepared.

The Contractor shall distribute two copies of all of these reports and data to the WAM.

All reports will be in accordance with contract specifications.

								_		
	United States Environmental Protection Agency				Work Assignment Number					
EPA		Washington, DC 20460 Work Assignment						_		
	Work A					Other	X Ame	ndme	ent Number:	
							000	00:	1	
Contract Number Contract Period 04/29/2011 To 03/28/2012					Title of Work Assignment/SF Site Name					
EP-D-11-006	Base X	Option Period Nur			Region Haze SIP for VI					
Contractor Specify Section and paragraph of Contract SOW										
EASTERN RESEARCH GROUP, INC. Purpose: Work Assignment Close-Out Period of Performance										
work Assignment Close-Out					renot of renormance					
X Work Assignment Amendment Incremental Funding					From 07/15/2011 To 03/28/2012					
Work Plan Approv	al				From 07/13/2011 16 03/28/2012					
Comments: The WP dated 08/19/11 has been reviewed and we concur with the labor mix, technical hours (567) ODCs, total estimated cost \$50,400 and completion date 03/28/12 as specified. Please see attachment for WP clarifications. The WA change is also to change the WAM to Bob Kelly (212-637-3709) and make Dan Birkett the Alternate. This document is IAQ the CMM 7.3.5.1(D)										
Superfund	Ac	counting and Approp	oriations Data	ĺ				Χ	Non-Superfund	
950	Note: To report additional	accounting and appropri	ations date use I	EPA Form 1900)-69A.		***			
SFO (Max 2)										
	propriation Budget Org/Code de (Max 6) (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Do	llars)	(Cents)	Site/Projec (Max 8)	xt	Cost Org/Code (Max 7)	
1										
2										
3										
4										
5					•					
	A	uthorized Work Assi	gnment Ceilin		ATT - 0.1 - 0.0					
Contract Period: 04/29/2011 To 03/28/20	Cost/Fee:			LOE:	250					
This Action:					3 17					
					, ·					
Total: 567										
	V	Vork Plan / Cost Esti	mate Approva	ıls						
Contractor WP Dated: Cost/Fee: LC										
Cumulative Approved:	Cost/Fee:			LOE:						
					ranch/Mail Code:					
					one Number 212-637-3709					
All Maria Mari				FAX	XX Number:					
				anch/Mail Code:						
					one Number: 919-541-2344					
					X Number:					
					anch/Mail Code:					
					one Number:					
					X Number: anch/Mail Code:					
					one Number: 919-541-3112					
Ph										

Title: Regional Haze SIP for VI

Contractor Name: ERG

Contract No #: EP-D-11-006

WA #: 1-03 change 1 WAM: Bob Kelly

The work plan has been approved with the following corrections:

Re: BART: Alternative language to clearly delineate the roles of ERG and EPA in the evaluation process:

As modified here:

EPA has developed a preliminary list of sources located in the Virgin Islands that meet these applicability requirements, and therefore may potentially be subject to BART. Under Task 3, ERG will review this list and will evaluate if the emission units meet the applicability requirements mentioned above.

And here:

Once the list of BART-eligible sources has been finalized, ERG will use methods in EPA's guidance and policy documents to evaluate these sources for potential retrofit controls to help the Virgin Islands meet their regional haze reduction targets.

Deliverable Dates: EPA needs the initial draft SIP by November 14, 2011 and the final package by February 28th, 2012. EPA will provide comments on the initial draft by December 23rd, 2011 and the revised draft should be completed by January 12th, 2012. EPA will provide comments on the revised draft by February 14, 2012.